

REMARKS

Claims 1-14 are pending in this application. By this Amendment, claims 1-4 are amended. No new matter is added by these amendments. Specifically, compounds having a triazine skeleton in the amended claims are described, for example, in examples 1, 2 and 3 of the specification, and the polymers in the amended claims are described, for example, in paragraphs [0018]-[0059] of the specification in which it is described that polymers can be produced by using the compounds of formula (1) at page 15, or formula (2) at page 17. Reconsideration based on the amendments and the following remarks is respectfully requested.

Applicants greatly appreciate the courtesies extended to Applicants' representatives during the personal interview held on March 20, 2007. The substance of the interview is incorporated below.

I. The Claims Define Allowable Subject Matter

The Office Action rejects claim 4 based on §102 over Nemoto et al. (US 5,525,457) Hong et al. (GB 2 357 512) and JP 10-120939. The Office Action rejects claims 2, 8 and 10 based on §102 over JP 06-35201. The Office Action rejects claim 3 based on §102 over Foster et al. (WO 00/53645). The Office Action rejects claims 1, 4, 6 and 11-14 based on §102 over Hong et al. (2003/0018150). The Office Action rejects claims 2 and 8 based on §102 over Lees et al. (US 5,380,804). The Office Action rejects claims 3 and 9 based on §102 over Derwent-Acc-No: 1986-290577. The Office Action rejects claims 3 and 9 based on §102 over Hitachi (JP 58-107312). The Office Action rejects claims 3 and 9 based on §102 over Harad et al. (EP 1203792). The Office Action rejects claim 4 based on §103(a) over Nemoto et al. (US 5,525,457). The Office Action rejects claims 3 and 7 based on §103(a) over Foster et al. (WO 00/53645). The Office Action rejects claims 1, 3, 5-7 and 11-14 based on §103(a) over Padmanaban et al. (US 6,114,085) in view of Foster et al. The

Office Action rejects claims 3 and 9 based on §103(a) over Kishioka et al. (US 2004/0110096). The rejections are respectfully traversed.

The Office Action asserts that US 5,525,457, GB 2 357 512, JP 10-120939, JP 06-35201, WO 00/53645, US 6,114,085, and US 2003/0018150 teach or suggest, *inter alia*, a resist underlayer coating forming composition characterized by comprising a polymer compound as presently claimed. However, as discussed during the personal interview, Applicants respectfully submit that the claims, as amended, obviate the rejections. Specifically, none of the immediately above-mentioned references teach or suggest triazine compounds. Indeed, none of the asserted art of record teaches or suggests anti-reflective coatings comprising triazine compounds.

The Office Action further asserts that US 5,380,804 teaches or suggests, *inter alia*, undercoating compositions as presently claimed. However, US 5,380,804 does not teach anti-reflective coatings for lithography comprising triazine skeletons, but instead teach powder coatings. Applicants thus respectfully submit that the claims, as amended, obviate the rejection.

The Office Action asserts that US 2004/0110096 teaches or suggests polymer compounds as presently claimed. However, US 2004/0110096 does not disclose phenolic hydroxyl groups as presently claimed. Indeed, the Office Action ignores the Federal Circuit's caution against misinterpretation of the Hass-Henze doctrine for evaluating obviousness of chemical compounds. Specifically, the Court has stated that "generalization should be avoided insofar as specific chemical structures are alleged to be *prima facie* obvious from the other." *In re Grabiak*, 769 F.2d 729, 731 (Fed. Cir. 1985). The cited references would not suggest to one of ordinary skill in the art that the mixing of any one of the formula (1) compounds with any of the resins given would lead to formation of the compositions used for forming anti-reflective coatings for use in a lithographic process to obtain an anti-reflective

layer with high reflection reducing effect without causing intermixing with a resist layer. Nor would one of ordinary skill in the art have any reasonable expectation of success in carrying out this endeavor, even based on the incorrectly alleged suggestion. Accordingly, Applicants respectfully submit that the claims, as amended, obviate the rejection.

The Office Action asserts that Derwent-Acc-No.: 1986-290577 teaches or at least suggests, *inter alia*, the undercoating of the presently claimed combination of features. However, the asserted reference provides no such teaching or suggestion.¹ Applicants respectfully submit that Derwent-Acc-No.: 1986-290577 does not teach or suggest anti-reflective coatings comprising triazine skeletons as presently claimed and is indeed completely unrelated to lithography, but instead relates to production of glass fibers. As such, Applicants respectfully submit that the claims, as amended, obviate the rejection.

The Office Action asserts that JP 58-107312 teaches anti-reflective coatings as presently claimed. However, JP 58-107312 neither teaches nor suggests the presently claimed anti-reflective coating comprising a triazine skeleton and indeed is wholly unrelated to lithography, but instead relates to laminates.

The Office Action asserts that EP 1203792 teaches or at least suggests anti-reflective coatings as presently claimed. However, the asserted reference provides no such teaching or suggestion. Specifically, the reference does teach anti-reflective coatings comprising triazine skeletons for lithography, but instead relates to resin compositions for semiconductor encapsulation.

In accordance with the foregoing, the asserted art of record neither teaches nor suggests the resist underlayer coating forming composition of the presently claimed

¹ Applicants assume that the Office Action intends to refer to JP 58-107312.

combination of features as reflected in the claims as amended. Accordingly, withdrawal of the rejections is respectfully requested.

Further, Applicants respectfully request that the Examiner clearly articulate the particular part of each reference relied on in each rejection. See MPEP §706.

II. Conclusion

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-14 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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